

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 23-158 (SRN/TNL)**

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United States of America,

Plaintiff,

vs.

Traigh Sean Tillman,

Defendant.

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**MOTION TO SUPPRESS ANY  
EVIDENCE OBTAINED AS  
A RESULT OF ANY  
ILLEGAL SEARCHES**

Defendant, Traigh Sean Tillman, by and through his attorney, Thomas H. Shiah, Esq., respectfully moves the Court to suppress any physical evidence obtained as the result of any illegal searches, seizures, or any such evidence derived from such illegal searches or seizures in violation of Defendant's rights under the Fourth Amendment to the United States Constitution. Fed.R.Crim.P. 12(b)(3). Specifically, defendant challenges the search and seizure of the following:

1. Search Warrant for information associated with Facebook user account for "Traigh Fat Man Tillman."

Defendant is challenging the search and seizure of information associated with defendant's Facebook user account. The affidavit in support of the warrant references various individuals categorized as cooperating witnesses, cooperating sources and informants. None of these individuals have been identified in the supporting affidavit of Special Agent Matthew Parker and in order to properly evaluate the probable cause for the warrant, it is necessary for defense counsel to have an unredacted copy. Accordingly, defendant reserves the right to challenge the search warrant pending a ruling on defendant's request for an unredacted copy.

In addition, the affidavit as submitted contains material misrepresentations. Specifically, at page 10 ¶20, FBI Special Agent Matthew Parker, states that Traigh Tillman... “shot and killed” a person at Goerge Floyd square. This is not true. Mr. Tillman was involved in an altercation with another individual at Goerge Floyd square, however, several other shots were fired by several other people and even the state court complaint, based on the same incident, does not attribute the death of the victim to Mr. Tillman.

Dated: August 1, 2023

Respectfully submitted,

S/Thomas H. Shiah

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